From: Wright, Jeff

To: <u>Gary Moore/R6/USEPA/US@EPA</u>

Cc: Bordelon, David

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Date: 01/15/2013 04:16 PM

I mentioned that I spoke with John Halk last week. I haven't heard back from him but the criteria at the Bayou Trepagnier site (LDEQ) was 8 psi; however most results were above 50 psi. I was able to download the Pilot Study Work Plan from the LDEQ website. It seems to be a similar version of the Malone Service Company Work Plan that you sent out but it is designed for an on-site treatability study. I would propose that we provide the Treatability Lab with our solidification criteria (UCS - 50 psi) along with the type of mix reagents and get them to provide a proposal for testing. This proposal is relatively inexpensive (~\$300) and would provide information needed to compile an overall Work Plan (eg., specific testing procedures, analytical analysis, treatability costs and estimated completion date). Let me know what you think.



Jeff Wright, CHMM Weston Solutions, Inc.

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Jeff.Wright@westonsolutions.com

From: Moore.Gary@epamail.epa.gov [mailto:Moore.Gary@epamail.epa.gov]

Sent: Thursday, January 10, 2013 3:54 PM

To: Wright, Jeff

Subject: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

FYI

Gary Moore Federal On-Scene Coordinator EPA Region 6

Cell: 214-789-1627 Work: 214-665-6609

email: moore.gary@epa.gov

---- Forwarded by Gary Moore/R6/USEPA/US on 01/10/2013 03:53 PM -----

From: Greg Powell/CI/USEPA/US
To: Gary Moore/R6/USEPA/US@EPA

Date: 12/05/2012 05:22 AM

Subject: Re: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Hi Gary:



The treatability is needed. Fly ash may be the best bet, but quicklime /cement should be evaluated. The problem with lime addition is that the higher pH's can sometimes re-mobilize the metals; however, a treatability study will give us that data.

No issues with John's comments.

Greg Powell USEPA-Environmental Response Team Cincinnati, Ohio (513)569-7533 (513)607-1572 cell

From: Gary Moore/R6/USEPA/US

Date: 12/04/2012 01:28 PM

Subject: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Greg:

Take a look and tell me what you think?

Gary Moore Federal On-Scene Coordinator EPA Region 6

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---- Forwarded by Gary Moore/R6/USEPA/US on 12/04/2012 12:27 PM -----

From: John Ha k < <u>John.Halk@LA.GOV</u>>

To: "Wright, Jeff" < Jeff.Wright@WestonSolutions.com >

Cc: Gary Moore/R6/USEPA/US@EPA, Todd Th bodeaux < Todd.Thibodeaux@LA.GOV >

Date: 12/04/2012 11:14 AM

Subject: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

Jeff:

Pit sludge exhibits some metals and PAH contaminants, as expected with hydrocarbon waste from ship/barge cleanout operations. For treatability samples, it is recommended to test reagent blends of fly ash, bed ash, or cement/lime (Cem-Lime)— a mixture of Portland cement and hydrated lime. Cement/lime mixture is probably best choice—it sets quickly, gives good unconfined compressive strength (recommended 8 psi or better), and can be transported to the site and mixed with long arm excavator.

Collect samples from highest COC locations within the pits and be sure to include highest visual oily material, representative of solid/liquid matrix of the sludge.

It is important to note, that the treatability testing is just that, and we are not pre-judging any future actions as to whether to go ahead with removal activities (whether in-situ or off-site), do other stabilization activities, such as strengthening levees. We can later have meetings to discuss any future action.

Also I think it is okay to use the RECAP Industrial Soil Screening Level as a comparison value to EPA RSLs outside the pit areas. Performing a 95 percent UCL on the outside sample locations (exclusive of the pits) may eliminate the arsenic and PAH constituents at RECAP industrial screening levels. The state RECAP standard for Arsenic is 12 ppm, so running a 95UCL may eliminate the samples outside of the pits.

We can afford to be less conservative inside the pits since this material could be treated and solidified. Please feel free to contact Todd or myself to further discuss the site. All in all, the sampling data looks much better than we anticipated.

Thanks, John Halk, CHMM

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